

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20194-CR-MARTINEZ

UNITED STATES OF AMERICA

v.

WILLIAN ALEXANDER POSADA SANDREA,

Defendant.

_____ /

CASE NO. 22-20420-CR-MARTINEZ

UNITED STATES OF AMERICA,

v.

ARMANDO ARIEL DE LEON,

Defendant.

_____ /

CASE NO. 22-20529-CR-MOORE

UNITED STATES OF AMERICA,

v.

DANIEL HERNANDEZ,

Defendant.

_____ /

**NOTICE OF RELATED AND SIMILAR ACTIONS
AND UNOPPOSED MOTION TO TRANSFER CASE**

The United States of America (the “United States”), pursuant to Local Rule 3.8 and the Court’s Internal Operating Procedures, Section 2.15.00, hereby notifies the Court of the following related and similar matters currently pending before the Court:

- *United States v. Willian Alexander Posada Sandrea*, 22-20194-CR-Martinez;

- *United States v. Armando Ariel De Leon*, 22-20420-CR-Martinez; and
- *United States v. Daniel Hernandez*, 22-20529-CR-Moore (collectively, the “Related and Similar Cases”).¹

The Related and Similar Cases stem from the same conspiracy and fraud scheme involving COVID-19 relief and Daniel Hernandez, a former regional manager at Bank 1.

Further, the United States moves unopposed to transfer *United States v. Hernandez*, 22-20529-CR-Moore, to Hon. Jose E. Martinez, who currently presides over the other two Related and Similar Cases: *United States v. Willian Alexander Posada Sandra*, 22-20194-CR, and *United States v. Armando Ariel De Leon*, 22-20420-CR. Defendant Daniel Hernandez does not oppose or otherwise object to the transfer.

As the Information in *United States v. Daniel Hernandez* alleges, and the Factual Proffer in *United States v. Armando Ariel De Leon* sets forth, Daniel Hernandez, Armando Ariel De Leon, and others conspired to submit false and fraudulent COVID-19 relief loan applications at, among other lenders, Bank 1, Hernandez and De Leon’s former employer. Hernandez and De Leon worked closely in furtherance of the conspiracy: De Leon maintained a spreadsheet cataloging each of the conspiracy’s fraudulent loans and received cash commissions on behalf of himself and Hernandez.

Willian Alexander Posada Sandra was a co-conspirator who conspired to submit over 20 false and fraudulent loan applications through Hernandez. He has pled guilty and is scheduled to be sentenced before Hon. Jose E. Martinez on November 14, 2022. (22-20194-CR-Martinez, Dkt. No. 52.)

¹ There are two other related and similar actions pending before the Court: *United States v. Erich Javier Alfonso Barata*, 22-20487-CR-Bloom, and *United States v. Melean Socorro and Castillo*, 22-20458-CR-Gayles. Notice of the related nature of all the cases was filed on each

De Leon has pled guilty and is scheduled to be sentenced before Hon. Jose E. Martinez on December 28, 2022. (22-20420-CR-Martinez, Dkt. No. 52.)

Hernandez was arraigned on November 4, 2022. (22-20529-CR-Moore, Dkt. No. 16.) His trial is scheduled for December 19, 2022. (22-20529-CR-Moore, Dkt. No. 17.)

In light of the fact that the defendants participated in the same conspiracy, the subject matter of the Posada Sandra and De Leon prosecutions forms “a material part of the subject matter” of the Hernandez prosecution. SDFL Internal Operating Procedures 2.15.00. Keeping the cases before two separate Judges “would appear to entail the unnecessary duplication of judicial labor.” *Id.* Consequently, the United States, without objection from Defendant Daniel Hernandez, moves to transfer 22-20529-CR-Moore to Hon. Jose E. Martinez.

Respectfully submitted,

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docket on October 12, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 10, 2022, I electronically filed the foregoing with the Clerk of the Court using CM/ECF.

/s/ Eli S. Rubin
Eli S. Rubin